

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA**

IN RE: AQUEOUS FILM-FORMING FOAMS  
PRODUCTS LIABILITY LITIGATION

) Master Docket No.:  
) 2:18-mn-2873-RMG

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CITY OF CAMDEN, et al.,

*Plaintiffs,*

-vs-

TYCO FIRE PRODUCTS LP, individually and as  
successors in interest to The Ansul Company, and  
CHEMGUARD, INC.

*Defendant.*

)  
) Civil Action No.:  
) 2:24-cv-02321-RMG  
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CITY OF CAMDEN, et al.,

*Plaintiffs,*

-vs-

BASF CORPORATION, individually and as successor in  
interest to Ciba Inc.,

*Defendant.*

)  
) Civil Action No.:  
) 2:24-cv-03174-RMG  
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**CLASS COUNSEL’S CONSENTED TO MOTION  
FOR AN ENLARGEMENT OF PAGE LIMIT FOR  
CLASS COUNSEL’S MEMORANDUM OF LAW IN SUPPORT OF THEIR  
MOTION FOR PRELIMINARY APPROVAL OF CLASS SETTLEMENT  
AND OTHER RELIEF**

Class Counsel hereby move this Court in accordance with Rule 7.05, DSC, for an enlargement of the number of pages permitted for their Memorandum of Law in Support of their Motion for

Attorneys' Fees and Costs for the settlements reached with Tyco Fire Products LP ("Tyco") and with BASF Corporation ("BASF") in the above-captioned matters.

The page limit for an initial brief is thirty-five (35) double spaced pages. *See* Local Rule 7.05(B)(21). Class Counsel respectfully request an enlargement of up to thirty-five (35) pages for their memorandum so that they may serve and file one memorandum of no more than seventy (70) pages in length.

In support of this motion, Class Counsel state that two new Class Action Settlement Agreements have been entered into between Plaintiffs and Tyco (the "Tyco PWS Settlement"), and between Plaintiffs and BASF (the "BASF PWS Settlement"), to resolve claims of PFAS contamination in the Drinking Water of the putative Class Member Public Water Systems. In an effort to maximize efficiency and minimize the burden on Court resources, and because of the identical nature of Class Counsel's request for attorneys' fees and costs from both the Tyco PWS Settlement and the BASF PWS Settlements, Class Counsel intend to combine the two requests and move concurrently for a Class Award from both Settlements.

So that Class Counsel may adequately address the legal standard for a Class Award of attorneys' fees and costs, and the complex facts of the matter at hand in the instant case, a lengthier brief is necessary to explain all the arguments. Class Counsel therefore respectfully request that they be permitted to file a single brief of up to seventy (70) pages.

The undersigned certifies that Class Counsel has conferred with counsel for Defendant BASF and BASF consents to this motion.

Dated: July 19, 2024

Respectfully submitted,

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*Proposed Class Counsel*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was electronically filed with this Court's CM/ECF on this 19<sup>th</sup> day of July, 2024 and was thus served electronically upon counsel of record.

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